

FILED

2013 NOV 20 PM 2:41

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
RIVERSIDE

BY:

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

September 2013 Grand Jury

UNITED STATES OF AMERICA,

No. ED CR 12-57(A) -VAP

Plaintiff,

F I R S T  
S U P E R   S E D I N G  
I N D I C T M E N T

v.

PAUL EDWARD BELL,  
aka "J-Roc,"  
aka "Jay-Roc,"  
aka "Best Choice,"  
aka "Jay the Truth,"  
aka "Rich Rollin,"  
aka "Jay Rich,"

SAMUEL ROGERS,  
aka "Bone," and  
GARY ROGERS,  
aka "G-Man,"  
aka "Hitter-Six,"  
aka "Hitter Cix,"

[18 U.S.C. § 1594(c): Conspiracy  
to Engage in Sex Trafficking; 18  
U.S.C. §§ 1591(a)(1), (a)(2),  
(b)(1), (b)(2): Sex Trafficking;  
18 U.S.C. § 922(g)(1): Felon in  
Possession of a Firearm]

Defendants.

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1594]

Beginning on a date unknown and continuing to in or about  
May 2012, in Riverside and Los Angeles Counties, within the  
Central District of California, and elsewhere, defendants PAUL

1 EDWARD BELL, also known as ("aka") "J-Roc," aka "Jay-Roc," aka  
2 "Best Choice," aka "Jay the Truth," aka "Rich Rollin," and aka  
3 "Jay Rich," SAMUEL ROGERS, aka "Bone," and GARY ROGERS, aka "G-  
4 Man," aka "Hitter-Six," aka "Hitter Cix," Christopher Weldon,  
5 aka "Chris Roc," aka "Bro Bro," aka "C-Roc," aka "Christopher  
6 Marcus," Javiya Brooks, aka "Shady Blue," aka "Shady," aka  
7 "Shady Baby," aka "Lady Shady," Kimberly Alberti, aka "Pucca,"  
8 aka "Pooka," and Kristy Harrell, and others known and unknown to  
9 the Grand Jury, conspired and agreed with each other to  
10 knowingly, in and affecting interstate and foreign commerce,  
11 recruit, entice, harbor, transport, provide, obtain, and  
12 maintain by any means, and benefit, financially and by receiving  
13 anything of value, from participation in a venture which  
14 recruited, enticed, harbored, transported, provided, obtained,  
15 and maintained the following individuals, as well as others,  
16 Victim 1, Victim 2, Victim 3, Victim 4, Victim 5, Victim 6, and  
17 Victim 7 (collectively, "the Victims"), knowing and in reckless  
18 disregard of the fact that force, threats of force, fraud, and  
19 coercion, as defined in Title 18, United States Code, Section  
20 1591(e)(2), and any combination of such means, would be used to  
21 cause the Victims to engage in commercial sex acts, and that  
22 Victim 1, Victim 2, Victim 3, Victim 4, Victim 5, and Victim 7  
23 had not attained the age of 18 years and would be caused to  
24 engage in commercial sex acts, all in violation of Title 18,  
25 United States Code, Sections 1591(a)(1), (a)(2), (b)(1) and  
26 (b)(2).

1 COUNT TWO

2 [18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2)]

3 Between in or about January 2011, and in or about August  
4 2011, in Riverside and Los Angeles Counties, within the Central  
5 District of California, and elsewhere, defendant PAUL EDWARD  
6 BELL, also known as ("aka") "J-Roc," aka "Jay-Roc," aka "Best  
7 Choice," aka "Jay the Truth," aka "Rich Rollin," aka "Jay Rich,"  
8 knowingly, in and affecting interstate and foreign commerce,  
9 recruited, enticed, harbored, transported, provided, obtained,  
10 and maintained by any means, and benefitted, financially and by  
11 receiving anything of value, from participation in a venture  
12 which recruited, enticed, harbored, transported, provided,  
13 obtained, and maintained Victim 3, knowing and in reckless  
14 disregard of the fact that force, threats of force, fraud, and  
15 coercion, as defined in Title 18, United States Code, Section  
16 1591(e)(2), and any combination of such means, would be used to  
17 cause Victim 3 to engage in a commercial sex act, and that  
18 Victim 3 had not attained the age of 18 years and would be  
19 caused to engage in a commercial sex act.

1 COUNT THREE

2 [18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2)]

3 Between in or about February 2011, and in or about July  
4 2011, in Riverside and Los Angeles Counties, within the Central  
5 District of California, and elsewhere, defendant PAUL EDWARD  
6 BELL, also known as ("aka") "J-Roc," aka "Jay-Roc," aka "Best  
7 Choice," aka "Jay the Truth," aka "Rich Rollin," aka "Jay Rich,"  
8 knowingly, in and affecting interstate and foreign commerce,  
9 recruited, enticed, harbored, transported, provided, obtained,  
10 and maintained by any means, and benefitted, financially and by  
11 receiving anything of value, from participation in a venture  
12 which recruited, enticed, harbored, transported, provided,  
13 obtained, and maintained Victim 4, knowing and in reckless  
14 disregard of the fact that force, threats of force, fraud, and  
15 coercion, as defined in Title 18, United States Code, Section  
16 1591(e)(2), and any combination of such means, would be used to  
17 cause Victim 4 to engage in a commercial sex act, and that  
18 Victim 4 had not attained the age of 18 years and would be  
19 caused to engage in a commercial sex act.

20

21

22

23

24

25

26

27

28

1 COUNT FOUR

2 [18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2)]

3 Between in or about January 2011, and in or about February  
4 2011, in Riverside and Los Angeles Counties, within the Central  
5 District of California, and elsewhere, defendant PAUL EDWARD  
6 BELL, also known as ("aka") "J-Roc," aka "Jay-Roc," aka "Best  
7 Choice," aka "Jay the Truth," aka "Rich Rollin," aka "Jay Rich,"  
8 knowingly, in and affecting interstate and foreign commerce,  
9 recruited, enticed, harbored, transported, provided, obtained,  
10 and maintained by any means, and benefitted, financially and by  
11 receiving anything of value, from participation in a venture  
12 which recruited, enticed, harbored, transported, provided,  
13 obtained, and maintained Victim 5, knowing and in reckless  
14 disregard of the fact that force, threats of force, fraud, and  
15 coercion, as defined in Title 18, United States Code, Section  
16 1591(e)(2), and any combination of such means, would be used to  
17 cause Victim 5 to engage in a commercial sex act, and that  
18 Victim 5 had not attained the age of 18 years and would be  
19 caused to engage in a commercial sex act.

20

21

22

23

24

25

26

27

28

1 COUNT FIVE

2 [18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2)]

3 Between in or about May 2011, and in or about August 2011,  
4 in Riverside and Los Angeles Counties, within the Central  
5 District of California, and elsewhere, defendant PAUL EDWARD  
6 BELL, also known as ("aka") "J-Roc," aka "Jay-Roc," aka "Best  
7 Choice," aka "Jay the Truth," aka "Rich Rollin," aka "Jay Rich,"  
8 knowingly, in and affecting interstate and foreign commerce,  
9 recruited, enticed, harbored, transported, provided, obtained,  
10 and maintained by any means, and benefitted, financially and by  
11 receiving anything of value, from participation in a venture  
12 which recruited, enticed, harbored, transported, provided,  
13 obtained, and maintained Victim 7, knowing and in reckless  
14 disregard of the fact that force, threats of force, fraud, and  
15 coercion, as defined in Title 18, United States Code, Section  
16 1591(e)(2), and any combination of such means, would be used to  
17 cause Victim 7 to engage in a commercial sex act, and that  
18 Victim 7 had not attained the age of 18 years and would be  
19 caused to engage in a commercial sex act.

20

21

22

23

24

25

26

27

28

1 COUNT SIX

2 [18 U.S.C. § 922(g)(1)]

3 On or about May 4, 2011, in Los Angeles County, within the  
4 Central District of California, defendant PAUL EDWARD BELL, also  
5 known as ("aka") "J-Roc," aka "Jay-Roc," aka "Best Choice," aka  
6 "Jay the Truth," aka "Rich Rollin," aka "Jay Rich" ("BELL"),  
7 knowingly possessed a firearm, namely, an Intratec model Tec-DC9  
8 machine pistol, with the serial number removed, in and affecting  
9 interstate and foreign commerce. Such possession occurred after  
10 defendant BELL had been convicted of at least one of the  
11 following felonies, each punishable by a term of imprisonment  
12 exceeding one year:

13 1. False Personation of Another, in violation of  
14 California Penal Code Section 529, in the Superior Court of the  
15 State of California, County of Los Angeles, case number  
16 KA07041401, on or about May 7, 2005;

17 2. Felon in Possession of a Firearm, in violation of  
18 California Penal Code Section 12021(a), in the Superior Court of  
19 the State of California, County of Riverside, case number  
20 RIF134327, on or about May 23, 2007;

21 3. Inflict Corporal Injury on a Spouse or Co-habitant, in  
22 violation of California Penal Code Section 273.5(a), in the  
23 Superior Court of the State of California, County of Los  
24 Angeles, case number TA09474601, on or about April 7, 2008.

1 COUNT SEVEN

2 [18 U.S.C. §§ 1591(a)(1), (b)(2)]

3 In or about January 2011, in Riverside and Los Angeles  
4 Counties, within the Central District of California, and  
5 elsewhere, defendant SAMUEL ROGERS, also known as "Bone,"  
6 knowingly, in and affecting interstate and foreign commerce,  
7 recruited and enticed Victim 1, knowing and in reckless  
8 disregard of the fact that Victim 1 had not attained the age of  
9 18 years and would be caused to engage in a commercial sex act.

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 COUNT EIGHT

2 [18 U.S.C. §§ 1591(a)(1), (b)(2)]

3 In or about January 2011, in Riverside and Los Angeles  
4 Counties, within the Central District of California, and  
5 elsewhere, defendant SAMUEL ROGERS, also known as "Bone,"  
6 knowingly, in and affecting interstate and foreign commerce,  
7 recruited and enticed Victim 2, knowing and in reckless  
8 disregard of the fact that Victim 2 had not attained the age of  
9 18 years and would be caused to engage in a commercial sex act.

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 COUNT NINE

2 [18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2)]

3 Between in or about January 2011, and in or about August  
4 2011, in Riverside and Los Angeles Counties, within the Central  
5 District of California, and elsewhere, defendant SAMUEL ROGERS,  
6 also known as "Bone," knowingly, in and affecting interstate and  
7 foreign commerce, recruited, enticed, harbored, transported,  
8 provided, obtained, and maintained by any means, and benefitted,  
9 financially and by receiving anything of value, from  
10 participation in a venture which recruited, enticed, harbored,  
11 transported, provided, obtained, and maintained Victim 3,  
12 knowing and in reckless disregard of the fact that force,  
13 threats of force, fraud, and coercion, as defined in Title 18,  
14 United States Code, Section 1591(e)(2), and any combination of  
15 such means, would be used to cause Victim 3 to engage in a  
16 commercial sex act, and that Victim 3 had not attained the age  
17 of 18 years and would be caused to engage in a commercial sex  
18 act.

19

20

21

22

23

24

25

26

27

28

1 COUNT TEN

2 [18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2)]

3 Between in or about February 2011, and in or about July  
4 2011, in Riverside and Los Angeles Counties, within the Central  
5 District of California, and elsewhere, defendant SAMUEL ROGERS,  
6 also known as "Bone," knowingly, in and affecting interstate and  
7 foreign commerce, recruited, enticed, harbored, transported,  
8 provided, obtained, and maintained by any means, and benefitted,  
9 financially and by receiving anything of value, from  
10 participation in a venture which recruited, enticed, harbored,  
11 transported, provided, obtained, and maintained Victim 4,  
12 knowing and in reckless disregard of the fact that force,  
13 threats of force, fraud, and coercion, as defined in Title 18,  
14 United States Code, Section 1591(e)(2), and any combination of  
15 such means, would be used to cause Victim 4 to engage in a  
16 commercial sex act, and that Victim 4 had not attained the age  
17 of 18 years and would be caused to engage in a commercial sex  
18 act.

19

20

21

22

23

24

25

26

27

28

1 COUNT ELEVEN

2 [18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2)]

3 Between in or about January 2011, and in or about February  
4 2011, in Riverside and Los Angeles Counties, within the Central  
5 District of California, and elsewhere, defendant SAMUEL ROGERS,  
6 also known as "Bone," knowingly, in and affecting interstate and  
7 foreign commerce, recruited, enticed, harbored, transported,  
8 provided, obtained, and maintained by any means, and benefitted,  
9 financially and by receiving anything of value, from  
10 participation in a venture which recruited, enticed, harbored,  
11 transported, provided, obtained, and maintained Victim 5,  
12 knowing and in reckless disregard of the fact that force,  
13 threats of force, fraud, and coercion, as defined in Title 18,  
14 United States Code, Section 1591(e)(2), and any combination of  
15 such means, would be used to cause Victim 5 to engage in a  
16 commercial sex act, and that Victim 5 had not attained the age  
17 of 18 years and would be caused to engage in a commercial sex  
18 act.

19

20

21

22

23

24

25

26

27

28

1 COUNT TWELVE

2 [18 U.S.C. §§ 1591(a)(1), (b)(1)]

3 Between in or about February 2011, and in or about March  
4 2011, in Riverside and Los Angeles Counties, within the Central  
5 District of California, and elsewhere, defendant SAMUEL ROGERS,  
6 also known as "Bone," knowingly, in and affecting interstate and  
7 foreign commerce, recruited, enticed, harbored, transported,  
8 provided, obtained, and maintained by any means Victim 6,  
9 knowing and in reckless disregard of the fact that force,  
10 threats of force, fraud, and coercion, as defined in Title 18,  
11 United States Code, Section 1591(e)(2), and any combination of  
12 such means, would be used to cause Victim 6 to engage in a  
13 commercial sex act.

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 COUNT THIRTEEN

2 [18 U.S.C. §§ 1591(a)(1), (b)(1)]

3 Between in or about February 2011, and in or about March  
4 2011, in Riverside and Los Angeles Counties, within the Central  
5 District of California, and elsewhere, defendant GARY ROGERS,  
6 also known as ("aka") "G-Man," aka "Hitter-Six," aka "Hitter  
7 Cix," knowingly, in and affecting interstate and foreign  
8 commerce, recruited, enticed, harbored, transported, provided,  
9 obtained, and maintained by any means Victim 6, knowing and in  
10 reckless disregard of the fact that force, threats of force,  
11 fraud, and coercion, as defined in Title 18, United States Code,  
12 Section 1591(e)(2), and any combination of such means, would be  
13 used to cause Victim 6 to engage in a commercial sex act.

14

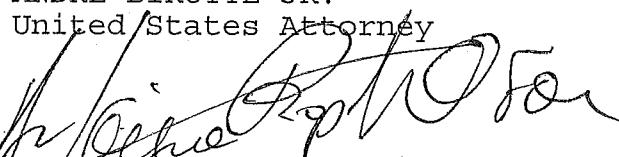
15 A TRUE BILL

16

17 \_\_\_\_\_  
Foreperson

18 ANDRÉ BIROTTÉ JR.

19 United States Attorney

20   
ROBERT E. DUGDALE

21 Assistant United States Attorney  
Chief, Criminal Division

22 ANTOINE F. RAPHAEL

23 Assistant United States Attorney  
Chief, Riverside Branch Office

24 AMI SHETH

25 Assistant United States Attorney  
Riverside Branch Office